

US Department of Justice
Civil Rights Division
Coordination and Review Section



COMPLAINT FORM

1. Name and Address:

NAME: [REDACTED]
ADDRESS: [REDACTED]
PHONE NO: [REDACTED]

2. Persons (other than above) discriminated against:

NAME: [REDACTED]
ADDRESS: [REDACTED]
PHONE NO: [REDACTED]

NAME: [REDACTED]
ADDRESS: [REDACTED]
PHONE NO: [REDACTED]

3. Agency(s) and department(s) or program that discriminated:

NAME: Anaconda Law Enforcement

INDIVIDUAL(S): John Sullivan (chief), [REDACTED]

ADDRESS: 800 S. Main Ave.
Anaconda, MT 59711
PHONE NO(S): 406-563-5241

NAME: Montana Secretary of State

INDIVIDUAL(S): [REDACTED]
ADDRESS: P.O. BOX 202801
Room 260, State Capital
Helena, MT 59620-2801
PHONE NO(S): 406-497-6200, 406-444-2034

NAME: United States Environmental Protection Agency

INDIVIDUAL(S): [REDACTED]
ADDRESS: 155 W. Granite
Butte, MT 59701
PHONE NO(S): 406-782-3264
INDIVIDUAL(S): [REDACTED] (Region VIII, Montana Office)
ADDRESS: 301 S. Park St. Drawer 10096
Helena, MT 59626
PHONE NO(S): 406-444-2544

OMB No. 1190-0008
Expires: 07/31/2010

INDIVIDUAL(S): [REDACTED]
Office of Regional Counsel, Region VIII
ADDRESS: 999 18th St. Suite 500
Denver, CO 80202
PHONE NO(S): 303-293-1735

3. Agency(s) and department(s) or program that discriminated (continued):

NAME: Anaconda Deer Lodge County

INDIVIDUAL(S): [REDACTED]
ADDRESS: 800 S. Main Ave.
Anaconda, MT 59711
PHONE NO(S): 406-563-4000

NAME: State of Montana, Department of Revenue

INDIVIDUAL(S): Dan Bucks, Director
ADDRESS: P.O. Box 5805
Helena, MT 59604
PHONE NO(S): 406-447-6280
INDIVIDUAL(S): [REDACTED] (Region 5 West)
ADDRESS: 151 W. Granite
Butte, MT 59701
PHONE NO(S): 406-497-6285
INDIVIDUAL(S): Eileen Dobinen (Treasurer), [REDACTED]
ADDRESS: 800 S. Main Ave.
Anaconda, MT 59711
PHONE NO(S): 406-563-4000

NAME: State of Montana, Department of Environmental Quality

INDIVIDUAL(S): [REDACTED] (Waste and Underground Tank Management)
[REDACTED] (Mine Waste Cleanup- Federal Superfund Section)
ADDRESS: 1520 E. 6th St.
P.O. BOX 200901
1520 E. 6th St.
Helena, MT 59620
PHONE NO(S): 800-433-8773 406-444-5300
406-841-5042, 406-841-5041

4. Non-Employment Discrimination Base(s):

Sex
Age

5. Contact Information (name, time, contact nos.)

[REDACTED]

6. Additional Contact Information:

[REDACTED]

7. Attorney Representation:

N/A

8. Dates of Discrimination:

Earliest date: June 1983

Latest Date: March 2009

8. Filing Requirement Waiver:

N/A

10. Description of what happened, why I believe it happened, and how I was discriminated against.

My husband and I deferred retirement to relocate to Montana and start a family business. We incorporated in the state of Montana and became an ongoing concern in 1982. The business involved turning vast waste piles of mine slag into a useable and environmental friendly commodity used for sand blasting and/or roofing granules. We diligently complied with all federal, state, county, and local regulations. In addition, we generated tax revenue, created employment opportunities and re-stimulated the local economy after years of depression. Other business started thriving (i.e. Rail and Trucking), the local environment improved, and what was once a waste heap was now a resource. We were the inventors and innovators of the processing as well as owners of the intellectual property rights. We were a successful, ongoing enterprise for 25 years that shipped product throughout the United States and exported to foreign countries. We also supplied the United States Navy exclusively.

I believe there is and was a conspiracy between the agencies listed in section 3 above, Atlantic Richfield Company (aka ARCO), Arco Environmental Remediation, LLC (aka AERL), Anaconda Local Development Corporation (aka ALDC), and the Rarus Railway Company (see Attachment 1 for additional information) to deprive my husband and I (and subsequently our children) of our livelihood and property without due process of the law as outlined in the United States Constitution. Through this conspiracy we were forced into years of litigation defending against frivolous law suits regarding processes, patents, and property ownership which continually threatened the viability of the business.

In addition, there is a clear pattern of discriminatory misconduct involving both my sex and age. This misconduct intensified when my husband died and I became a widow. Our God given rights to equal protection under the law was denied by the conduct of all the conspirators.

11. Actions taken and retaliation against:

I acted to protect the family business. The above named governmental agencies, ARCO, AERL, Rarus Railway Co. and the ALDC retaliated through coercion and intimidation. The ALDC, EPA, and AERL coerced to manipulate CERCLA law (USC 42 9601) against my business. They used their knowledge of my husband's death (November 2002), my age and my sex to intensify their efforts and put me out of business.

12. Witness Contacts:

Cary Hester, Montana Department of Commerce, International Trade Officer
1424 9th Ave. P.O. Box 200505
Helena, MT 59620
406-444-4112
406-841-2754

Todd Kodason, FBI, Agent
Washington, DC
202-329-6930

Brian Stone, FBI, Agent
Salt Lake City, UT
801-579-1400

Roxanne Petersen, U.S. EPA, Director
Helena, MT
406-247-7774

Matt Morrison, U.S. EPA, Attorney
Washington, DC
202-532-3255

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13. Other Relevant Information:

Due to discrimination and the continual intimidation of the various agencies I was forced out of business. A once thriving company has now been stayed, enjoined, intervened, defaulted, amended and confiscated without due process of the law.

14. Remedies:

Return of the business and it's assets in operational condition.
Restitution for all expenses incurred and compensation for lost income.
Review and censure of all authorities and individuals responsible for this action.

15. Previously filed complaints and description:

Filed complaint with the Federal Bureau of Investigation against the State of Montana December 2007 and July 2008 for discrimination, loss of liberty and property, and economic espionage. No complaint number. No satisfaction.

Filed complaint with the EPA Ombudsman February 2008. No complaint number, no satisfaction.

16. Intention to file additional complaints to:

U.S. Equal Employment Opportunity Commission
Federal and State Courts
State and Local Human Relations/Rights Commission
Grievance and compliant office

17. Additional information for answers to #16:

N/A

18. DOJ program funds?:

No knowledge either way.

19. Signature and date of complaint form:

Signed and Dated:

[REDACTED]

3-24-09

20. How did you learn you could file this complaint?:
From researching the internet.**21. Previously assigned DOJ complaint number?:**
N/A

ATTACHMENT 1:

Co-conspirators as mentioned in Questions 10 and 11 of the complaint:

Atlantic Richfield Company (aka ARCO):

317 Anaconda Rd.
Butte, MT 59701
406-782-9964

Arco Environmental Remediation, LLC (aka AERL)

307 E. Park St. Suite 400
Anaconda, MT 59711
406-563-5269

Attorneys for ARCO AND AERL:

Poore, Roth, and Robinson, PC
1341 Harrison Ave.
P.O. Box 2000
Butte, MT 59701
406-497-1200

[REDACTED]

Davis, Graham & Stubbs
1550 17th St Suite 500
Denver, Co. 80202
303-892-9400

[REDACTED]

Individuals involved in the conspiracy (interchangeable between ARCO and AERL):

[REDACTED]

[REDACTED]

[REDACTED]

Anaconda Local Development Corporation (aka ALDC):

James Davidson- Registered Agent
118 E. 7th St.
Anaconda, MT 59711
406-563-5538

[REDACTED]

Rarus Railway Company:

900 E. Commercial Ave.
P.O. Box 1070
Anaconda, MT 59711
406-563-2661 406-563-7121

[REDACTED]

Registered Agents for ARCO and AERL and Rarus:

CT Corporation System

17 N. Front St.

Cascade, MT 59421

406-468-0123

Arco Environmental Remediation, LLC (AERL):

Address(s) on record:

4101 Winfield Rd.

Warrenville, IL 60555

Managers on record at above address:

Geoffrey E. Stein

Stephen A. Elbert

Address(s) on record:

200 E. Randolph Dr.

Chicago, IL 60601

Managers on record at above address:

Robert J. Novaria

Debra A. Plumb

Ian Springett